

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

IN RE:	§	
THOMAS C. BROWN	§	NO. 09-50070
	§	
	§	
	§	
DEBTOR	§	

RESPONSE OF FIRSTBANK TO OBJECTION
TO PROOF OF CLAIM FILED BY
MIKE TUCKER AND SUSAN TUCKER

COMES NOW John D. Raffaelli, and files this his Response to the Objection to Proof of Claim filed by Debtor Thomas C. Brown, and would respectfully show the court:

1. John D. Raffaelli filed a Proof of Claim showing home mortgage arrearages in the amount of \$61,189.42.
2. Attached is proof of payment of property taxes and insurance for the property objected to by the Debtor.
3. John D. Raffaelli, requests this matter be set for hearing and value be determined by the Court.

WHEREFORE, Creditor, John D. Raffaelli request that this matter be set for hearing and that value be determined by the Court and that they be entitled to all relief available under law.

Respectfully submitted,

____/s/Alwin A. Smith____
Alwin A. Smith

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Telephone: 903/792-1608
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ATTORNEYS FOR JOHN D. RAFFAELLI

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been sent to Mr. Rodney McDaniel, 4503 Texas Blvd., Texarkana, Texas 75501, Attorney for the Debtor and Janna Countryman,, by electronic mail, Chapter 13 Trustee, on this the _____ day of October, 2009.

_____/s/Alwin A. Smith_____
Alwin A. Smith